

LAWRENCE J. SEMENZA, LTD.
3753 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
Telephone: (702) 369-6999

Lawrence J. Semenza, Esq.
Nevada Bar No. 789
LAWRENCE J. SEMENZA, LTD.
3753 Howard Hughes Parkway, Suite 200
Las Vegas, Nevada 89169
Telephone: (702) 369-6999
Facsimile: (702) 995-9036

Email: lsemenza@semenzalawfirm.com
Attorneys for Erin Kuhn-Brown

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

ERIN KUHN-BROWN,

Plaintiff,

v.

DWIGHT NEVEN, et al.,

Defendants.

Case No. 2:19-cv-01140-RFB-MDC

**STIPULATION AND ORDER TO
EXTEND PLAINTIFF'S
RESPONSE/OPPOSITION TO
DEFENDANTS' MOTION FOR
SUMMARY JUDGMENT**

(SECOND REQUEST)

Plaintiff, ERIN KUHN-BROWN, by and through her attorney of record, Lawrence J. Semenza, Esq., of the law firm of Lawrence J. Semenza, Ltd., and Defendants, by and through their Attorney of Record, Aaron D. Ford, Nevada Attorney General, and Leo T. Hendges, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby file Sfirst Stipulation to Extend Plaintiff's time to respond/oppose Defendants' Motion for Summary Judgment due to be filed August 18, 2025.

I. SUMMARY JUDGMENT MOTION

Defendants' Motion for Summary Judgment was filed and served on July 7, 2025, and included some 19 Exhibits, consisting of Declarations in support of the Motion and Exhibits consisting of Plaintiff's grievances filed at Florence McClure Women's Correctional Institution.

1 Counsel for Plaintiff has been working with his client to prepare the response/opposition
2 and locate witnesses to assist in responding to Defendants' Motion but will not be able to meet the
3 extended deadline of August 18, 2025.

4 Counsel for the respective parties have agreed to extend Plaintiff's response/opposition to
5 and including Monday, September 8, 2025.

6 DATED this 11th day of August, 2025.

DATED this 11th day of August, 2025

7 LAWRENCE J. SEMENZA, LTD.

AARON D. FORD
ATTORNEY GENERAL

8 /s/ Lawrence J. Semenza

/s/ Leo T. Hendges

9 Lawrence J. Semenza, Esq., Bar No. 789
10 3753 Howard Hughes Parkway, Suite 200
11 Las Vegas, Nevada 89169

Leo T. Hendges, Bar No. 16034
Senior Deputy Attorney General
1 State of Nevada Way Suite 100
Las Vegas, NV 89119

12 *Attorneys for Plaintiff Erin Kuhn-Brown*

Attorney for Defendants

13 **ORDER**

14 **IT IS HEREBY ORDERED:**

15
16 Plaintiff's response/opposition to Defendants' Motion for Summary Judgment is extended
17 from August 18, 2025, until and including Monday, September 8, 2025.

18 DATED this 12, day of August, 2025.

19
20
21 

22 UNITED STATES DISTRICT JUDGE

23 Submitted by:
24 LAWRENCE J. SEMENZA, LTD.

25 /s/ Lawrence J. Semenza

26 LAWRENCE J. SEMENZA, ESQ.
27 3753 Howard Hughes Parkway Suite 200
28 Las Vegas, NV 89169
Attorneys for Plaintiff Erin Kuhn-Brown